

ORAL ARGUMENT NOT YET SCHEDULED

No. 15-5041
(Consolidated with 15-5043, 15-5060, and 15-5061)

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

HUMANE SOCIETY OF THE UNITED STATES, *et al.*,
Appellees,

v.

S.M.R. JEWELL, *et al.*,
STATE OF WISCONSIN, *et al.*, and
U.S. SPORTSMEN'S ALLIANCE FOUNDATION, *et al.*,
Appellants

Declaration of Joan M. Pepin

I, Joan M. Pepin, declare pursuant to 28 U.S.C. §1746 as follows:

1. I am an attorney in the Appellate Section, Environment and Natural Resources Division (ENRD), U.S. Department of Justice. I am lead counsel for the federal appellants in this appeal, and I am principally responsible for preparing the opening brief. That brief is currently due on October 28, 2015.

2. I have been working diligently to prepare the government's brief in this case, but it will not be possible for me to file the opening brief by October 28, 2015. Preparing this brief has been unusually time-consuming because of the exceptional breadth and complexity of the case. The district court decision under review is 111 pages long, and its judgment is based on six independent bases, each of which must be fully briefed. Recognizing the unusually complex nature of this case, this Court has authorized briefing in excess of the standard word limits. While I have devoted the majority of my time to working on this brief, earlier this month I also had to spend a substantial portion of my time to research and prepare for a mediation in *Trunk et al. v. Mount Soledad Mem'l Ass'n*, 9th Cir. 13-57126.

3. Significant time is required for review and approval of the government's brief in this appeal. The U.S. Fish & Wildlife Service and the U.S. Department of the Interior need time to review and approve the brief. Within the Department of Justice, additional time is needed so that the Natural Resources Section and the office of the Assistant Attorney General for the Environment may review and approve the answering brief. The

requested extension is necessary to allow the required people to review the brief before it is filed.

4. I have contacted counsel for all parties to this appeal. Each has responded that they do not oppose the requested 9-day extension of time.

I certify, under penalty of perjury, that the foregoing is true and correct. Executed on this 19th day of October, 2015, in Washington, D.C..

s/ Joan M. Pepin

Joan M. Pepin
Attorney, Appellate Section
Environment & Nat'l Resources Div.
U.S. Department of Justice
P.O. Box 7415
Washington, DC 20044
(202) 305-4626
joan.pepin@usdoj.gov